



Air Pollution Control Board

San Diego County Air Pollution Control District

GOVERNING BODY

GREG COX
First District

DIANNE JACOB
Second District

DAVE ROBERTS
Third District

RON ROBERTS
Fourth District

BILL HORN
Fifth District

AGENDA ITEM

DATE: December 14, 2016

AP01

TO: Air Pollution Control Board

SUBJECT: ADOPTION OF 2016 REGIONAL AIR QUALITY STRATEGY REVISION
(DISTRICTS: ALL)

Overview

This is a request to approve the proposed Regional Air Quality Strategy (RAQS) Revision, which is a proposed plan demonstrating how the San Diego region will further reduce air pollution emissions to meet the state health-based standards for ground-level ozone. Ozone, also known as "smog," is a harmful air pollutant that is formed when emissions from motor vehicles, industrial plants, consumer products, and other sources interact under the influence of sunlight and heat. This invisible gas that reacts with human tissue and can cause eye, nose, and throat irritation along with permanent lung damage. Accordingly, the state ozone standards are set by the California Air Resources Board (CARB) at levels deemed protective of public health.

The RAQS was initially adopted by the Board on June 30, 1992 (AP01). Subsequent implementation of the RAQS through collaborative efforts of businesses, the County, and many other stakeholders has significantly reduced the ozone levels in our air and the number of days exceeding the state ozone standards. Since the last revision of the RAQS (April 22, 2009, AP01), total ozone-forming emissions in the region have been reduced by 28%.

Notwithstanding the significant progress toward clean air, the region has yet to attain the state ozone standards. Accordingly, state law requires periodic updates of the RAQS that incorporate new air pollution control measures as they become feasible, including measures that have been successfully implemented in other regions. Such measures are suggested based on an initial consideration of available technology, costs to businesses, and the benefits potentially conferred upon air quality and public health if they are implemented.

Today's requested action would not establish any new air pollution control requirements. Rather, upon the Board's adoption of this RAQS update, the individual measures will then be further evaluated and, if confirmed to be feasible for sources of air pollutants in San Diego County, developed into proposed rules or rule amendments at a later date for the Board's future consideration. If further evaluation reveals that an individual measure is not feasible, then the measure will not be developed into a proposed rule for implementation in San Diego County.

Approval of the proposed 2016 RAQS Revision is requested, as it incorporates seven measures

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suggested for further evaluation. These measures are already implemented in other regions of the state and, based on preliminary review by staff, are potentially feasible for sources in the San Diego region. These measures address ozone-forming emissions from: (1) new stationary engines; (2) new small boilers; (3) composting operations (non-residential); (4) marine coatings; (5) natural gas-fired central furnaces; (6) aerospace coatings; and (7) medium size boilers.

If implemented, the proposed measures are estimated to collectively reduce ozone-forming emissions by approximately 1.5 tons per day. This represents a 4.5% reduction in total existing emissions from all stationary sources in the region (33 tons per day) and would accelerate the region's progress toward attaining the state ozone standards.

Recommendation(s)

CHIEF ADMINISTRATIVE OFFICER

1. Find that the previously certified Final Environmental Impact Report for the RAQS, SCH No. 91061009, was completed in compliance with the California Environmental Quality Act, and that the Air Pollution Control Board has reviewed and considered the information contained therein prior to approving the project.
2. Find that there are no changes in the project or in the circumstances under which it is undertaken which involve significant new environmental impacts which were not considered in the previously certified Final Environmental Impact Report, and that there is no substantial increase in the severity of previously identified significant effects, and that no new information of substantial importance has become available since the Environmental Impact Report was prepared; and therefore, preparation of an Addendum is appropriate under California Environmental Quality Act Guidelines Section 15162.
3. Adopt the resolution entitled "Resolution Adopting the 2016 Regional Air Quality Strategy Revision and Making Relevant Findings." The resolution certifies that the Revision is a cost-effective strategy and that the Board has adopted, or scheduled for further review and adoption, every feasible control measure. It also finds that the repealed state emission offset requirements remain unnecessary in San Diego County.
4. Direct the Air Pollution Control Officer to forward the proposed 2016 Regional Air Quality Strategy Revision to CARB for acceptance.

Fiscal Impact

There is no fiscal impact associated with these recommendations. Funding for future analysis and evaluation of measures is included in the Fiscal Year 2016-17 Operational Plan as staff time in the Air Pollution Control District. There will be no change in net General Fund cost and no additional staff years.

Business Impact Statement

Adoption of the proposed RAQS Revision would not establish any new air pollution control requirements on businesses. Rather, it would commit staff to further evaluate the individual measures to determine their feasibility based on technology availability, emission reduction potential and cost-effectiveness. Measures that are confirmed feasible will be developed into

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proposed rules or rule amendments at a later date for future consideration by the Board, and specific impacts will be addressed at that time. Staff will work with affected industries to ensure each proposed rule is feasible to implement.

Advisory Board Statement

The Air Pollution Control District Advisory Committee considered the proposal during its meeting on October 19, 2016. While the Advisory Committee did not have a quorum, all members present expressed support of the Air Pollution Control District's recommendations.

Background

The RAQS was initially adopted by the Board in 1992 in response to a then-new state one-hour ozone standard that the region had not attained. The RAQS (and all subsequent RAQS revisions) identifies all feasible air pollution control measures to expeditiously attain the state ozone standards in San Diego County.

The state ozone standards place limits on the one-hour (0.09 parts per million or ppm) and eight-hour (0.070 ppm) average ozone levels in our air. In 2009 when the RAQS was last revised, the region's one-hour and eight-hour ozone levels were 0.119 ppm and 0.089 ppm, respectively. By comparison, the current one-hour and eight-hour ozone levels are 0.095 ppm and 0.079 ppm, respectively, reflecting ozone measurement data through 2015.

The region has yet to attain the state ozone standards despite significant progress toward clean air. As such, state law requires periodic RAQS updates that incorporate new measures as they become feasible. The proposed 2016 RAQS Revision (Attachment A) identifies the following seven measures that will undergo further evaluation and, if warranted, will be developed into proposed rules or rule amendments for the Board's consideration over the next few years.

Pollutant*/ Control Measure	Proposed Action	Proposed Schedule for Rulemaking (if warranted)
NOx/New Stationary Internal Combustion Engines	Possible amendments to Rule 69.4.1	2017
NOx/Small Boilers, Process Heaters, and Steam Generators between 75,000 - 600,000 BTU/hour	Possible amendments to Rule 69.2.1	2017
VOC/Composting Operations (Non-Residential)	Possible new Rule 67.25	2017
VOC/Further Control of Marine Coatings	Possible amendments to Rule 67.18	2018
NOx/Further Control of Natural Gas-Fired Fan-Type Central Furnaces	Possible amendments to Rule 69.6	2018-2019
VOC/Further Control of Aerospace Coating Operations	Possible amendments to Rule 67.9	2018-2019
NOx/Medium Boilers, Process Heaters, and Steam Generators between 2 - 5 million BTU/hour	Evaluate possible new Rule 69.2.2	To be determined, pending technology availability

* Targeted pollutants are oxides of nitrogen (NOx) and volatile organic compounds (VOC) (smog precursors).

The proposed 2016 RAQS Revision was developed in collaboration with CARB and with input from local facilities and the public. On September 8, 2016, the Air Pollution Control District held a public workshop to discuss and receive comments on the proposal and no significant

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issues or concerns were raised. Staff prepared a workshop report with responses to the comments and questions received (Attachment D).

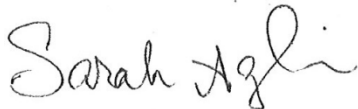
Environmental Statement

A programmatic Environmental Impact Report (EIR) for the RAQS was certified by the Air Pollution Control Board on June 30, 1992 (AP01), analyzing potential environmental impacts of control technologies in the RAQS. The analysis found that any potential adverse environmental impacts would be mitigated to be less than significant. An Addendum to the EIR was completed on September 21, 2016 (Attachment B), and found that no additional significant adverse impacts would result from the proposed 2016 RAQS Revision. The Revision proposes the adoption of more stringent emissions limits using similar control technologies for the same control measures as analyzed in the previous programmatic EIR. The Revision also proposes consideration of new measures; if they are determined to be feasible and proposed for adoption, full environmental analysis of the measures will be conducted at that time. Thus, there are no changes in the project, changes in circumstance, or new information of substantial importance that results in major revisions of the previous EIR. No additional environmental review or findings are necessary pursuant to the California Environmental Quality Act Guidelines Section 15162.

Linkage to the County of San Diego Strategic Plan

Today's proposed actions support the Sustainable Environments Initiative in the County of San Diego's 2016-2021 Strategic Plan with an objective to promote an environment where residents can enjoy clean air. The proposal provides ongoing reductions in air pollution emissions and helps ensure County residents will have cleaner air to breathe for years to come.

Respectfully submitted,



SARAH E. AGHASSI
Deputy Chief Administrative Officer



ROBERT J. KARD
Air Pollution Control Officer

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ATTACHMENT(S)

Attachment A – Proposed 2016 Regional Air Quality Strategy Revision

Attachment B – 2016 Addendum to the Final EIR for the San Diego 1991 RAQS;
Final EIR for San Diego 1991 RAQS;

2009 Addendum to the Final EIR for the San Diego 1991 RAQS

Attachment C – Resolution titled “Resolution Adopting the 2016 Regional Air Quality Strategy
Revision and Making Relevant Findings”

Attachment D – Workshop Report

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AGENDA ITEM INFORMATION SHEET

REQUIRES FOUR VOTES: ☐ Yes ☒ No

WRITTEN DISCLOSURE PER COUNTY CHARTER SECTION 1000.1 REQUIRED

☐ Yes ☒ No

PREVIOUS RELEVANT BOARD ACTIONS:

April 22, 2009 (AP01), Approved 2009 Triennial Regional Air Quality Strategy Revision; July 28, 2004 (AP01), Approved 2004 Triennial Regional Air Quality Strategy Revision; August 8, 2001 (AP01), Approved 2001 Triennial Regional Air Quality Strategy Revision; November 4, 1998 (AP03), Repealed Emission Offset Requirements pursuant to State Law; June 17, 1998 (AP01), Approved 1998 Triennial Regional Air Quality Strategy Revision; December 12, 1995 (AP03), Approved 1995 Triennial Regional Air Quality Strategy Update; March 2, 1993 (AP01), Approved Amended 1991 Regional Air Quality Strategy; June 30, 1992 (AP01), Approved 1991 Regional Air Quality Strategy.

BOARD POLICIES APPLICABLE:

N/A

BOARD POLICY STATEMENTS:

N/A

MANDATORY COMPLIANCE:

N/A

**ORACLE AWARD NUMBER(S) AND CONTRACT AND/OR REQUISITION
NUMBER(S):**

N/A

ORIGINATING DEPARTMENT: AIR POLLUTION CONTROL DISTRICT

OTHER CONCURRENCES(S): N/A

CONTACT PERSON(S):

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